217/782-2113

"REVISED"
TIEL V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT[1]

PERMITTEE

Radio Flyer, Inc.
Attn: Paul Pasin, Vice President of Manufacturing
6515 West Grand Avenue
Chicago, Illinois 60707

Application No.: 95120168 I.D. No.: 031600EEO
Source Location: 6515 West Grand Avenue, Chicago, Cook County
Operation of: Steel Toys Manufacturing Date Received: March 7, 1996
Date Issued: December 2, 1998 Expiration Date: December 1, 2003
Responsible Official: Paul Pasin, Vice President of Manufacturing

This permit is hereby granted to the above-designated Permittee to OPERATE a Steel Toys Manufacturing Plant, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

Revision Date Received: September 26, 2000
Revision Date Issued: December 4, 2000
Purpose of Revision: Minor Modification

This minor modification reflects the removal of the general waste incinerator.

If you have any questions concerning this permit, please contact Anatoly Belogorsky at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:AB:psj

cc: Illinois EPA, FOS, Region 1
USEPA

[1] This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the CAA and regulations promulgated thereunder, including 40 CFR 52.21 – federal PSD and 35 IAC Part 203 – Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within this permit.

[2] Except as provided in Condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Radio Flyer, Inc.
6515 West Grand Avenue
Chicago, Illinois 60707
773/637-7100

I.D. No.: 031600EEO
Standard Industrial Classification: 3944, Games, Toys & Children=s Vehicles

1.2 Owner/Parent Company

Radio Flyer, Inc.
6515 West Grand Avenue
Chicago, Illinois 60707

1.3 Operator

Radio Flyer, Inc.
6515 West Grand Avenue
Chicago, Illinois 60707

Contact Person=s Name:
Paul Pasin
773/637-7100

1.4 General Source Description of Source

Radio Flyer, Inc. located at 6515 West Grand Avenue in Chicago and produces steel toy wagons and toy wheelbarrows. The significant emission units at the source are grouped into the following categories: large parts washer; three coating lines (spray line, wheel line and paint dip line) with three bake ovens; paint burn off oven with an afterburner; and natural gas fired boilers.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

Act	Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollution Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through E), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27717
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CFR	Code of Federal Regulations
CO	Carbon Monoxide
°F	degrees Fahrenheit
ft	feet
ft^3	cubic foot
g	grams
gal	gallon
gr	grains
HAP	Hazardous Air Pollutant
HCl	Hydrogen Chloride
Hp	Horsepower
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
Illinois EPA	Illinois Environmental Protection Agency
kg	kilogram
l	liter
lb	pound
LEL	Lower Explosive Limit
m	meter
MBtu	Million Btus
mg	milligrams
mo	month
MW	Megawatts
NSPS	New Source Performance Standards
NO_x	Nitrogen Oxides
PIMW	Potentially Infectious Medical Wastes
PM	Particulate Matter
ppm	Parts Per Million
PSD	Prevention of Significant Deterioration
psia	pounds per square inch absolute
scf	standard cubic feet
scm	standard cubic meters
SIC	Standard Industrial Classification
SO_2	Sulfur Dioxide
T	Tons
TOC	Total Organic Compounds
USEPA	United States Environmental Protection Agency
VOL	Volatile Organic Liquid
VOM	Volatile Organic Material
VOC	Volatile Organic Compounds

Wt	weight
yr	year

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a)(1) and 201.211, as follows:

None

3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a)(2) or (a)(3), as follows:

Welding Stations

3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a)(4) through (18), as follows:

Direct combustion units designed and used for comfort heating purposes and fuel combustion emission units as follows: Boiler and heaters with a rated heat input capacity of less than 2.5 MBtu/hr that fire only natural gas;

Printing operations with aggregate organic solvent usage that never exceeds 750 gallons per year from all printing lines at the source, including organic solvent from inks, dilutents, fountain solution, and cleaning materials;

Storage tanks containing exclusively soaps and detergents; and

Unloading systems for tank trucks that handle only soaps and detergents.

3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b).

3.2 Addition of Insignificant Activities

3.2.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).

3.2.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than

those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.

3.2.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Equipment	Description	Emission Control Equipment
Group 1	Coating Lines	Three Coating Lines with Bake Ovens	Filters on two coating lines
Group 2	Paint Burn off Oven	Incineration of the paint residue from used paint hooks	Afterburner
Group 3	Three Boilers	Natural Gas-Fired Total firing rate 14.6 MBtu/hr	None
Group 4	Large Parts Washer	Two stage parts washer utilized non-organic soaps and detergents	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of VOM emissions.

5.2 Applicable Regulations

5.2.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions) of this permit.

5.2.2 In addition, emission units at this source are subject to the following regulations of general applicability:

a. No person shall cause or allow the emissions of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.

b. Emissions of smoke or other particulate matter from any emission unit shall not exceed 30% opacity, except that opacity of greater than 30% but less than 60% shall be allowed for periods aggregating 8 minutes in any 60 minutes period provided that such more opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 m (1000 ft) radius from the center point of any such emission unit owned or operated by the Permittee and provided further that such more opaque emissions permitted from each such emission unit shall be limited to 3 times per 24 hour period pursuant to 35 IAC 212.123(a) and (b).

c. No person shall cause or allow the emissions of sulfur dioxide into the atmosphere from any process emission unit in excess of 2,000 ppm [35 IAC 214.301].

5.2.3. The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

5.3 Non-Applicability of Regulations of Concern

None

5.4 Source-Wide Operational and Production Limits and Work Practices

In addition to the source-wide requirements in the Standard Permit Conditions in Section 9, the Permittee shall fulfill the following source-wide operational and production limitations and/or work practice requirements:

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	30.79
Sulfur Dioxide (SO_2)	---
Particulate Matter (PM)	1.34
Nitrogen Oxides (NO_x)	5.54
HAP, not included in VOM or PM	---
TOTAL	37.67

5.5.2 Emissions of Hazardous Air Pollutants

The emissions of HAPs as listed in section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish by regulation so that this source is considered a minor source for HAPs.

5.5.3 Other Source-Wide Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to either the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, or Section 502(b) (10) of the CAA.

5.6 General Recordkeeping Requirements

5.6.1 Emission records

a. The Permittee shall keep and maintain records of total emissions on a calendar year basis for the equipment covered by unit-specific conditions (Section 7) to demonstrate compliance with Condition 5.5.1.

b. The Permittee shall keep records of the total natural gas usage, in terms of therms/month and therms/year or scf/month and scf/year, for all natural gas-fired emission units described in Section 7.

5.6.2 Retention and Availability of Records

a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.

b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.7 General Reporting Requirements

5.7.1 Annual Emissions Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information for the previous year.

5.7.2 The Permittee shall promptly notify the Illinois EPA if the emissions exceed the limits in Condition 5.5.1 and appropriate unit-specific conditions of Section 7

5.8 General Operational Flexibility/Anticipated Operating Scenarios

None

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Allowable Emissions

Compliance with the source-wide emission limits specified in Condition 5.5.1 shall be based on the recordkeeping and reporting requirements, and Compliance Procedures in Section 5 and Section 7 (Unit-Specific Conditions) of this permit.

6.0 EMISSION REDUCTION MARKET SYSTEM (ERMS)

6.1 Description of ERMS

The ERMS is a Acap and trade@ market system for major stationary sources located in the Chicago ozone nonattainment area. It is designed to reduce VOM emissions from stationary source to contribute to further reasonable progress toward attainment, as required by Section 182(c) of the Clean Air Act.

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Under the ERMS, participating sources must hold Aallotment trading units@ (ATUs) for their actual seasonal VOM emissions. Each year participating sources are issued ATUs based on allotments set during initial issuance of the sources: CAAPP permit. These allotments are established from historical VOM emissions or Abaseline emissions@ lowered to provide the emission reduction from stationary sources required for further progress.

By December 31 of each year, the end of the reconciliation period following the seasonal allotment period, each source should have sufficient ATUs in its account to cover its actual VOM emissions during the preceding season. An account:s balance as of December 31 will include any valid ATU transfer agreements entered into as of December 31 of the given year, provided such agreements are promptly submitted to the Illinois EPA for entry into the account database. The Illinois EPA will then retire ATUs in sources: accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its account, the Illinois EPA will issue a notice to the source to begin the process for Emissions Excursion Compensation.

In addition to receiving ATUs pursuant to their allotments, participating sources may also obtain ATUs from the market, including ATUs bought from other participating sources and general participants in the ERMS that hold ATUs (35 IAC 205.630) and ATUs issued by the Illinois EPA as a consequence of VOM emission reductions from an Emission Reduction Generator or an Intersector Transaction (35 IAC 205.500 and 205.510). During the reconciliation period, sources may also buy ATUs from a secondary reserve of ATUs managed by the Illinois EPA, the Alternative Compliance Market Account (35 IAC 205.710). A source may also transfer or sell the ATUs that it holds to other sources or participants (35 IAC 205.630).

This section becomes federally enforceable upon approval of the ERMS by USEPA as part of Illinois' State Implementation Plan.

6.2 Applicability

a. Emissions of VOM from the source for the seasonal allotment period of May 1 through September 30 of each year shall not exceed 15 tons, not including VOM from insignificant units and activities as identified in

Section 3 of this permit. This limitation is established at the request of the source to exempt it from the requirements of 35 IAC Part 205, Emissions Reduction Market System (ERMS) pursuant to 35 IAC 205.205.

6.3 Recordkeeping and Reporting

a. The Permittee shall maintain the following records to determine of compliance with the above limitation:

i. Records of operating data and other information for each individual emission unit or group of related emission units at the source, as specified in Sections 5 and 7 of this permit, as appropriate to determine VOM emissions during the seasonal allotment period;

ii. Records of the VOM emissions in tons during the seasonal allotment period, with supporting calculations, for each individual emission unit or group of related emission units at the source, determined in accordance with the procedures specified in Sections 5 and 7 of this permit;

iii. Total VOM emissions from the source in tons during each seasonal allotment period.

b. The Permittee shall submit the seasonal emissions component of the annual emissions report by October 31 of each year, reporting emissions of VOM during the seasonal allotment period, in accordance with 35 IAC 205.205(b) and 205.300.

c. In the event that the source's VOM emissions during the seasonal allotment period exceed 15 tons, the source shall no longer be exempt from the ERMS and beginning with the following seasonal allotment period, shall comply with 35 IAC 205.200, by holding allotment trading units (ATUs) for its VOM emissions during each seasonal allotment period.

7.0 UNIT SPECIFIC CONDITIONS

7.1 Group 1: Coating Lines

7.1.1 Description

Coating operation consists of three coating lines (Spray Line, Wheel Line and Paint Dip Line) which apply extreme performance coating to the steel toy wagons and wheelbarrows. Following coating, the parts are conveyed to bake ovens for drying.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Group 1	Coating Lines	Three Coating Lines with Bake Ovens. - Wheel Line - Spray Line - Paint Dip Line Construction Dates: Wheel Line: 1955 Spray Line: 1965 Paint Dip Line: 1950	 Filters Filters

7.1.3 Applicability Provisions and Applicable Regulations

a. The "affected coating lines" for the purpose of these unit specific conditions are three coating lines and three bake ovens which are used to apply an extreme performance coating to metal that falls under the category of miscellaneous metal parts and products.

b. Affected coating lines at the source are subject to limitations of 35 IAC 218.204 (j)(2)(B) for extreme performance baked coating, which provides that:

i. No owner or operator of an affected coating line shall apply at any time any coating in which the VOM content exceeds the following emission limitations for the coating as applied to Miscellaneous Metal Parts and Products. The following emission limitation is expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator:

kg/l	lb/gal
0.40	3.3

ii. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composites.

c. The affected coating lines at the source are subject to 35 IAC 212.321(1), which provides that:

i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].

ii. The emissions of particulate matter into the atmosphere in any one hour period from each of the affected coating lines shall not exceed the allowable emission rates specified in the following equation:

$$E = A(P)^B$$

where:

P = process weight rate;
E = allowable emission rate; and,

A. For process weight rates up to 408 Mg/hr (450 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534

B. For process weight rates in excess of 408 Mg/hr (450 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	11.42	24.8
B	0.16	0.16

7.1.4 Non-Applicability of Regulations of Concern

a. The affected coating lines are not subject to 35 IAC Subpart G: Use of Organic Material, pursuant to 35 IAC 218.209, Exemption From General Rule on Use of Organic Material, which excludes affected coating lines from this requirement.

b. The affected coating lines are not subject 35 IAC 216.121, Emissions of Carbon Monoxide from Fuel Combustion Emission Units, because the affected coating lines are not by definition a fuel combustion emission units.

c. The affected coating lines are not subject 35 IAC 217.121, Emissions of Nitrogen Oxides from New Fuel Combustion Emission Units, because the affected coating lines are not by definition a fuel combustion emission units.

7.1.5 Operational and Production Limits and Work Practices

a. The affected coating lines bake ovens shall only be operated with natural gas as the fuel.

b. The Permittee shall operate, maintain, and replace the filters in a manner that assures compliance with the conditions of this section.

7.1.6 Emission Limitations

Refer to Condition 7.1.3.

7.1.7 Testing Requirements

a. Upon reasonable request by the Illinois EPA or USEPA, the VOM content of specific coatings and cleaning solvents used on the affected coating line shall be determined according to USEPA Reference Method 24 of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a) and 218.211(a).

i. The VOM content of representative coatings Aas applied@ on the affected coating line shall be determined according to USEPA Reference Method 24 of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a); and

ii. This testing may be performed by the supplier of a material provided that the supplier provides appropriate documentation for such testing to the Permittee and the Permittee=s records pursuant to Condition 7.1.9(b) directly reflect the application of such

material and separately account for any additions of solvent.

b. The percent concentration of solvent in the VOM containing waste from the affected coating lines shall be determined in accordance with USEPA Test Methods for Evaluation of Solid Waste, Physical/Chemical Methods (SW-846), Test Methods 8260.

7.1.8 Monitoring Requirements

None

7.1.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected coating lines to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

a. The name and identification number of each coating clean-up solvent as applied on the affected coating line;

b. The usage of each coating and clean-up solvent, in units of gallons/month and gallons/year;

c. VOM content of each coating applied based on USEPA Method 24 analysis or Material Safety Data Sheet (lb/gallon or Wt.%);

d. Density of each applied coating and cleanup solvent, in units lb/gal; and

e. Amount of sludge (gallons/month and gallons/year) generated on the affected coating lines and VOM content of sludge (lb/gallon or Wt.%).

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with applicable requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

Pursuant to 35 IAC 218.211(c)(3)(A) & (B) the Permittee shall notify the Illinois EPA in the following instances:

a. Any record showing violation of Section 218.204 (j)(2)(B) shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation; and

b. At least 30 calendar days before changing the method of compliance from Section 218.204 to Section 218.205 or Section 218.207, the Permittee shall comply with all requirements of Section 218.211(d)(1) or Section 218.211(e)(1), respectively.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected coating lines without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee=s obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Usage of coatings, thinners, or cleaning solvents at this source with various VOM contents provided that the materials are tested in accordance with Condition 7.1.7, the source wide emission limitations in Condition 5.5.1 are not exceeded and the affected coating lines remain in compliance with Condition 7.1.3(b).

7.1.12 Compliance Procedures

a. Compliance with the particulate matter limitations in this section is assured and achieved by the proper operation and maintenance of the filters as required by this section and the work-practices inherent in operation of an affected coating lines.

b. Compliance of the affected coating lines with the source wide emission limitations in Condition 5.5.1 shall be based on the recordkeeping requirements in Condition 7.1.9 and the following equation:

i. Emissions from Coating Operation (EI) =[Actual Coating Usage (gal/mo) x Coating Density (lb/gal) x VOM Content of the Coating (wt.%)] - [VOM Containing Waste (gal/mo) x Waste Density (lb/gal) x VOM Content in Waste (wt.%)];

ii. Emissions from Cleanup Operation (EII) = (Actual Clean-up Solvent Usage (gal/mo) x Solvent Density (lb/gal) x VOM Content of the Clean-up Solvent (wt.%) - [VOM Containing Waste (gal/mo) x Waste Density (lb/gal) x VOM Content in Waste (wt.%)]; and

iii. Total VOM emissions = E1 + E2

c. Compliance of the affected coating lines with VOM emission limitations in Condition 7.1.3(b) shall be based on the recordkeeping requirements in Condition 7.1.9 and by the use of either testing as required in Condition 7.1.7 or by use of the formula listed below:

VOM Coating Content = V x D/[1 - W x D],

where

V = percent VOM in the coating (%)

D = overall coating density (lb/gal)

W = ' (w_i/d_i),

where

w_i = percent exempt compound i in the coating,

d_i = overall density of exempt compound i, lb/gal

and the summation ' is applied over water and all exempt compounds i in the coating.

7.2 Group 2: Paint Burn off Oven

7.2.1 Description

The paint burn off oven is used to clean the paint residue of the used paint hooks. The oven is equipped with an afterburner to pyrolyze VOM emissions.

7.2.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Group 2	Paint Burn off Oven	Natural gas fired Construction date: 1995	Afterburner

7.2.3 Applicability Provisions and Applicable Regulations

a. An "affected burn off oven" for the purpose of these unit specific conditions is the paint burn off oven with an afterburner which is used to remove any paint residue from used paint hooks.

b. An affected oven is subject to 35 IAC 212.321(b), which provides that:

i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].

ii. The emissions of particulate matter into the atmosphere in any one hour period from each of the affected coating lines shall not exceed the allowable emission rates specified in the following equation:

$$E = A(P)^B$$

where:

P = process weight rate;
E = allowable emission rate; and,

A. For process weight rates up to 408 Mg/hr (450 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534

B. For process weight rates in excess of 408 Mg/hr (450 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	11.42	24.8
B	0.16	0.16

c. An affected oven is subject to the following limitations of 35 IAC 212.123(a):

No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission other than those emission units subject to 35 IAC 212.122.

d. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit [35 IAC 218.301].

7.2.4 Non-Applicability of Regulations of Concern

The affected oven is not regulated by 35 IAC 216.141 and 212.184, because this system is a process emission unit but not fuel combustion or incinerator unit.

7.2.5 Operational and Production Limits and Work Practices

a. i. The secondary combustion chamber (afterburner) of the affected oven shall be preheated to the manufacturer=s recommended temperature but not lower than 1400EF prior to introducing waste into the furnace.

ii. This temperature shall be maintained until burnout of waste in the primary chamber is completed.

b. The amount of waste input to the oven shall be consistent with the manufacturer=s recommended practices for charging of waste.

7.2.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5.1, an affected paint burn off oven is subject to the following:

Item of Equipment	Hours of Operation (hr/yr)	EMISSIONS PM (lb/hr)	PM (T/yr)	NO_x (lb/hr)	NO_x (T/yr)
Paint Burn Off Oven	2,000	0.55	0.55	0.04	0.04

The above limitations were established in construction permits 95020121. These limits are based on the maximum operating rate. These limits are established to ensure that the constructions of the process unit does not constitute a new major source or major modification pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). Compliance with annual limits shall be determined on a monthly basis from a running total of 12 month of data.

7.2.7 Testing Requirements

None

7.2.8 Monitoring Requirements

a. Affected oven shall be equipped with a secondary combustion chamber temperature indicator; and

b. The condition of affected oven shall be inspected on a periodic basis for the presence of deficiencies.

7.2.9 Recordkeeping Requirements

The Permittee shall maintain the following records for affected oven to demonstrate compliance with conditions of this section, pursuant to Section 39.5(7)(b) of the Act:

a. A secondary combustion chamber temperature during the time of operation;

b. Amount of waste (paint residue) incinerated (lb/hr and tons/yr);

c. Hours of operation per year;

d. Operating logs for oven, which include time beginning of charge waste, operating temperature of secondary chamber, time burnout of waste completed; and

e. Inspection maintenance logs for the system, with dates of inspection, maintenance, repair, or other actions completed.

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with applicable requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

Operation of the secondary combustion chamber (afterburner) with a temperature below than 1400°F or below manufacturer's recommended temperature.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

None

7.2.12 Compliance Procedures

a. Compliance with Condition 7.2.3(b) is assumed to be achieved by the work-practices inherent in operation of the afterburner on affected oven along with the procedures specifying a minimum combustion chamber temperature in Condition 7.2.5, so that no compliance procedures are set in this permit.

b. Compliance with Condition 7.2.3(c) is assumed to be achieved by the work-practices inherent in operation of affected oven, so that no compliance procedures are set in this permit addressing this regulation.

c. To determine compliance with Conditions 5.5.1 and 7.2.6, emissions of PM from the affected burn off paint oven shall be calculated based on the allowable emission rates from Condition 7.2.3(b).

7.3 Group 3: Boilers

7.3.1 Description

Natural gas-fired boilers located at the source are used to produce heat for the plant.

7.3.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Group 3	Three Boilers	Natural gas-fired boilers. Maximum heating capacity: One boiler- 5.8 MBtu/hr and two boilers - 4.4 Btu/hr each Construction Dates: Prior to 1950	None

7.3.3 Applicability Provisions and Applicable Regulations

a. Boilers located at the source are not subject to 35 IAC 217.141, Emissions Of Nitrogen Oxides From Existing Fuel Combustion Emission Sources In Major Metropolitan Areas, because the actual heat input of each boiler is less than 73.2 MW (250 MBtu/hr).

b. Boilers located at the source are not subject to 35 IAC 216.121, Fuel Combustion Emission Sources, because the actual heat input from boilers is less than 2.9 MW (10 MBtu/hr).

7.3.4 Non-Applicability of Regulations of Concern

Pursuant to 35 IAC 218.303, any fuel combustion emission unit is not subject to 35 IAC Part 218, Subpart G: Use of Organic Material.

7.3.5 Operational and Production Limits and Work Practices

Each boiler shall only be operated with natural gas as the fuel.

7.3.6 Emission Limitations

None

7.3.7 Testing Requirements

None

7.3.8 Monitoring Requirements

None

7.3.9 Recordkeeping Requirements

The Permittee shall maintain any of the following records for the boilers to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

a. Total natural gas usage (therms or ft^3 /month and therms or ft^3/year) for all boilers; or

b. Hours of operation for each boiler (hr/year).

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the control and operating requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

None

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.3.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.3.9 and the emission factors and formulas listed below:

To determine compliance with Condition 5.5.1, emissions from the boilers burning natural gas shall be calculated based on one of the following:

a. Natural gas usage

Pollutant	Natural Gas Emission Factors ($lb/10^6 ft^3$)
PM	7.6
NO_x	100
SO_2	0.6
VOM	5.5

These are the emission factors for uncontrolled natural gas combustion in small boilers (< 100

MBtu/hr), Tables 1.4-1, 1.4-2, AP-42, Volume I, March, 1998.

Boiler Emissions (lb) = natural gas consumed multiplied by the appropriate emission factor.

b. Hours of operation

$$\text{Boiler Emissions (lb)} = \frac{\text{firing rate} \times \text{emission factor}}{1000} \times \text{hours of operation}$$

7.4 Group 4: Large Parts Washer

7.4.1 Description

Two stage large parts washer is used to wash the large formed parts prior to the painting operations. Hot soapy water and hot rinse water utilized during this 2-stage washer process.

7.4.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Group 4	Large Parts Washer	Two stage parts washer with natural gas fired water heaters. Firing Rate, MBtu/hr: Stage 1: 9.0 Stage 2: 6.3	None

7.4.3 Applicability Provisions and Applicable Regulations

An Aaffected parts washer@ for the purpose of these unit specific conditions is a two stage washing operation of large formed parts prior to the painting operations.

7.4.4 Non-Applicability of Regulations of Concern

The affected parts washer is not regulated by 35 IAC Part 218, Subpart E: Solvent Cleaning, because volatile organic materials are not used for cleaning purposes [35 IAC 218.181].

7.4.5 Operational and Production Limits and Work Practices

a. Parts washer shall only be operated with natural gas as the fuel.

b. Parts washer shall only be operated with non-VOM containing cleaning materials.

7.4.6 Emission Limitations

None

7.4.7 Testing Requirements

None

7.4.8 Monitoring Requirements

None

7.4.9 Recordkeeping Requirements

The Permittee shall maintain any of the following records for the parts washer to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

a. Total natural gas usage per month (therms/month or scf/month) and per year (therms/year or scf/year); or

b. Hours of operation for each parts washer (hr/year).

7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with applicable requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

None

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

None

7.4.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.5.9 and the emission factors and formulas listed below:

To determine compliance with Condition 5.5.1, emissions from the parts washer's water heater burning natural gas shall be calculated based on the following:

a. Natural gas usage

Pollutant	Natural Gas Emission Factors ($lb/10^6 ft^3$)
PM	7.6
NO_x	100
SO_2	0.6
VOM	5.5

These are the emission factors for uncontrolled natural gas combustion in small boilers (< 100 MBtu/hr), Tables 1.4-1, 1.4-2, AP-42, Volume I, March 1998.

Emissions (lb) = natural gas consumed multiplied by the appropriate emission factor.

b. Hours of operation

$$\text{Boiler Emissions (lb)} = \frac{\text{firing rate} \times \text{emission factor}}{1000} \times \text{hours of operation}$$

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements as of the date the proposed permit for this source was issued. This shield is granted based on the Illinois EPA's review of the permit application for this source and its determination that all applicable requirements are specifically identified in this permit. If the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to the source, the Illinois EPA's written determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after June 11, 1998 unless the permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

8.3 Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, or other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement. [Section 39.5(7)(o)(vii) of the Act]

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes without applying for or obtaining an amendment to this permit, provided that the changes do not constitute a modification under Title I of the CAA, emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change and the Permittee provides written

notice to the Illinois EPA, Division of Air PollutionControl, Permit Section, at least 7 days before commencement of the change. This notice shall:

a. Describe the physical or operational change;

b. Identify the schedule for implementing the physical or operational change;

c. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;

d. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and

e. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other process, emissions, or composition parameters shall be conducted using standard test methods. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

A report summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

Monitoring Period	Report Due Date
January - June	September 1
July - December	March 1

All such reports shall be certified in accordance with Condition 9.9.

8.6.2 Test Notifications

Unless otherwise specified elsewhere in the permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior the testing pursuant to Section 39.5(7)(a) of the Act. The notification shall include at a minimum:

a. The name and identification of the affected unit(s);

b. The person(s) who will be performing sampling and analysis and their experience with similar tests;

c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;

d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;

e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;

f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and

g. Any proposed use on an alternative test method, with detailed justification.

8.6.3 Test Reports

Unless otherwise specified elsewhere in the permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum:

a. The name and identification of the affected unit(s);

b. The date and time of the sampling or measurements;

c. The date any analyses were performed;

d. The name of the company that performed the tests and/or analyses;

e. The test and analytical methodologies used;

f. The results of the tests including raw data, and/or analyses including sample calculations;

g. The operating conditions at the time of the sampling or measurements; and

h. The name of any relevant observers present including the testing company=s representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:

i. Illinois EPA - Air Compliance Section

Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (MC 40)
P.O. Box 19276
Springfield, Illinois 62794-9276

ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

iii. Illinois EPA - Air Permit Section (MC 11)

Illinois Environmental Protection Agency
Divisions of Air Pollution Control
Permit Section
P.O. Box 19506
Springfield, Illinois 62794-9506

iv. USEPA - Air Branch

United States EPA (AR - 17J)
Air & Radiation Branch (Illinois - Indiana)
77 W. Jackson Boulevard
Chicago, Illinois 60604

b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in the permit and as allowed by law and rule. [Section 39.5(7)(j)(iv) of the Act]

9.1.2 In particular, this permit does not alter or affect the following:

a. The provisions of Section 303 (emergency powers) of the Clean Air Act, including USEPA's authority under that Section;

b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

c. The applicable requirements of the acid rain program consistent with Section 408(a) of the Clean Air Act; and

d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the Clean Air Act.

9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of the permit. Any permit noncompliance constitutes a violation of the Clean Air Act and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application. [Section 39.5(7)(o)(i) of the Act]

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.

9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless such malfunction or breakdown is allowed by a permit condition. [Section 39.5(6)(c) of the Act]

9.2.4 Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Environmental Protection Act or regulations promulgated thereunder.

9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto. [Section 39.5(7)(o)(vi)] The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois 62794-9276.

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(p)(ii) of Act]:

a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of the permit;

b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment), practices, operations regulated or required under the permit;

d. Sample or monitor any substances or parameters at any location:

i. At reasonable times, for the purposes of assuring permit compliance; or

ii. As otherwise authorized by the CAA, or this Act.

e. Obtain and remove samples of any discharge or emission of pollutants; and

f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source.

9.4 Obligation to Comply With Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

9.5 Liability

9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the sources.

9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the source.

9.5.5 Property Rights

The permit does not convey any property rights of any sort, or any exclusive privilege.

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes.

9.6.3 Retention of Records

a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. [Section 39.5(7)(e)(ii) of the Act]

b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Compliance Section no later than May 1 of the following year, as required by 35 IAC Part 254.

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit compliance certifications annually or more frequently as specified in the applicable requirement or by permit condition.

a. The certifications shall include descriptions on means to monitor the compliance of the source including emissions limitations, standards, and work practices in accordance with applicable requirements and permit conditions. The certification shall include the identification of each term or condition of the permit that is the basis of the

certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.

b. All compliance certifications must be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.

c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

Any document (including reports) required to be submitted by a CAAPP permit shall contain certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act [Section 39.5(7)(k) of the Act]. An example Certification by a Responsible Official is included as an attachment to this permit.

9.10 Defenses to Enforcement Action

9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [Section 39.5(7)(o)(ii) of the Act]

9.10.2 Emergency Provision

a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operation logs, or other relevant evidence:

i. An emergency occurred as provided in Subsection 7(k) of Section 39.5 of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;

ii. The permitted source was at the time being properly operated;

iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working day of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any

steps taken to mitigate emissions, and corrective actions taken; and

iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in the permit.

b. This provision is in addition to any emergency or upset provisions contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless the permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on the permit.

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

The permit may be modified, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification, revocation, and reissuance, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [Section 39.5(7)(o)(iii) of the Act]

9.12.2 Reopening and Revision

The permit must be reopened and revised if any of the following occur [Section 39.5(15)(a) of the Act]:

a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;

b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;

c. The Illinois EPA or USEPA determines that the permit contains a material mistake or inaccurate statement when establishing the emission standards or

limitations, or other terms or conditions of the permit; and

d. The Illinois EPA or USEPA determines that the permit must be revised to ensure compliance with the applicable requirements of the Act.

9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under Section 39.5(15)(a)(iii) of the Act.

9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by the permit or, for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality. [Section 39.5(7)(o)(v) of the Act]

9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if the permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force. [Section 39.5(7)(i) of the Act]

9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions. [Section 39.5(5)(l) and (n) of the Act]

10.0 ATTACHMENTS

10.1 Attachment 1 - Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature _____

Name _____

Official Title _____

Telephone No. _____

Date Signed _____

AB:psj